Case 8:23-bk-10571-SC ######### ERIC BENSAMOCHAN, Esq. SBN 255482 The Bensamochan Law Firm Inc. 4# 9025 Wilshire Blvd Suite 215 Beverly Hills, CA. 90211 5# Tel: (818) 574-5740 Fax: (818) 961-0138 6# Email: eric@eblawfirm.us ########## 7‡ 8# 9# # 32 # In re: # # 33# # # 34# # # 35# LITIGATION PRACTICE GROUP. # 36# # # 37# # # 38# # # 39# # # 3:# #

3; # # #42#

43# # #44#

#45#

#46#

#47#

#48#

#4:#

#49#

UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA SANTA ANA DIVISION

Chapter 11

363(M)

Case No. 8:23-bk-10571-SC

DECLARATION OF ERIC

BENSAMONCHAN IN SUPPORT OF

THE BID BY THE BENSAMOCHAN

IN SUPPORT OF A GOOD FAITH

FINDING PURSUANT TO SECTON

LAW FIRM INC. AS PURCHASER, AND

DECLARATION OF ERIC BENSAMOCHAN

- I, Eric Bensamochan, do hereby declare that all the following is true and correct to the best of my knowledge, and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.
 - 1. That I am an attorney, duly licensed in the State of California and, in The United States District Court for The Central District of California, and in This Honorable United States Bankruptcy Court. My State Bar Number is 255482.

#4:#

- 2. That I make this declaration in support of my bid to purchase the assets of Litigation Practice Group (The Debtor), and in support of a good faith finding pursuant to section 363(m) of the United States Bankruptcy Code.
- 3. I initially became involved in this case by referral from a previous client who introduced me to the Managers of Affirma, LLC. Affirma LLC is a non-institutional lender to the Debtor and has filed a general unsecured claim in excess of \$67 million dollars.
- 4. Upon reviewing certain documentation provided to me by representatives of Affirma, LLC, I contacted Mr. Jeff Golden to co-counsel with me in this representation. I did so for a number of reasons, not limited to the fact that I have previously co-counseled with Mr. Golden and have a solid working relationship with him. Mr. Golden has a stellar reputation. I knew that this case would be complex and aggressively prosecuted and felt that the need for additional counsel would be warranted.
- 5. I, along with Mr. Golden, have been retained to represent Oxford Knox, LLC, who is also a creditor of the Debtor. As of the filing of this declaration, a proof of claim has not been filed on behalf of Oxford.
- 6. Mr. Golden and I also interviewed with the OUST based on our desire to represent Affirma LLC on the Official Committee of Unsecured Creditors. On June 29, 2023, the OUST filed an amended appointment and notice of appointment of Official Committee of Unsecured Creditors, adding Affirma LLC and Abigail Beaudin to the Committee. Mr. Golden and I have been sharing in that responsibility.
- 7. While working on this case, I became aware of the potential sale of the LPG assets and the potential challenges of such a sale. It became clear to me that while hotly contested as to the ability of the appointed Chapter 11 trustee to conduct a sale of this entity, the need for an experienced attorney to purchase the entity (being a law firm) and respond to the multitude of consumers that may be in desperate need of debt relief services.
- 8. That I began some informal discussions with Counsel for the Chapter 11 Trustee

#4:#

- about the potential for my firm, or what will be a newly created law firm (Sunset Coast Legal Group) as a potential purchaser.
- 9. That I realize that there is a tremendous amount of work that has gone into the viability of a sale and that the only real way for the vast number of creditors in this case to receive any monetary recovery would be for the purchase of the asset and an ongoing purchase payment arrangement with the Estate.
- 10. That I have sent an updated version of the APA to Trustee's counsel and proposed the terms that are spelled out in the APA.
- 11. That I have paid special attention to the requirement of a court appointed Monitor, and have absolutely no objection to the requirement, nor do I have any objection to Ms. Rappaport being the monitor.
- 12. That I fully intend to follow all guidelines of the APA, including the reporting requirements, the cooperation with the Trustee, and the Monitor, and to follow all applicable laws and statutes.
- 13. That I have been licensed to practice law since 2008 (15 years) and have no record of discipline by the State Bar of California, which is the only state in which I am licensed.
- 14. That prior to attending law school, I was employed by Kaiser Permanente in their regulatory compliance group, focusing on privacy and security. This means that I have a background in understanding governmental regulations and the implementation of those regulations.
- 15. That I have no connection, directly or indirectly, to Tony Diab, LPG, CLG, or any of the Debtor's principals or insiders.
- 16. That my current practice is almost entirely consumer-based Bankruptcy. That I understand Debt Relief and more importantly, I understand what is not allowable and what is.
- 17. That I will be as open and transparent to this court, the appointed monitor, the Committee, Committee Counsel, The Trustee, Trustee's Counsel, the OUST, and any

other regulatory body. I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed this 20th day of July of 2023, at Beverly Hills, California. Dated: July 20, 2023 The Bensamochan Law Firm, Inc. /s/Eric Bensamochan Eric Bensamochan, Esq. # #48# #49# #4:#